

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE 2014 AVON PRODUCTS, INC.
ERISA LITIGATION**

14 Civ. 10083 (LGS)

**PLAINTIFFS' MOTION¹ FOR AN AWARD OF ATTORNEYS'
FEES, REIMBURSEMENT OF EXPENSES AND CASE
CONTRIBUTION AWARDS TO PLAINTIFFS**

Pursuant to Federal Rule of Civil Procedure 23(h), Plaintiffs Kay E. Comstock, Mark Jacobs, Kathleen A. McCoy, Frank Pacific, George Poovathur and Katherine C. Walker ("Named Plaintiffs") respectfully move for an Order:²

- A. Awarding attorneys' fees of 28% of the Settlement Fund, or \$1,750,000.00, together with the interest earned thereon for the same time period and at the same rate as that earned on the Settlement Fund until paid;
- B. Reimbursing Plaintiffs' Counsel's litigation expenses in the amount of \$35,974.71; and
- C. Awarding case contribution awards of \$5,000 to each of the Named Plaintiffs.

The grounds for the Motion are set forth in the supporting Memorandum filed herewith, as well as in the Joint Declaration of Michael J. Klein and Samuel E. Bonderoff In Support of

¹ The Parties conferred on September 6, 2016, and Defendants take no position on Plaintiffs' Motion.

² A form of [Proposed] Final Approval Order was filed as Exhibit 2 to the Class Action Settlement Agreement and Release, dated May 23, 2016 (the "Settlement Stipulation") (Dkt. No. 61-1). Plaintiffs have, to the extent possible, filled in the blanks (without making any other changes) and have filed that version of the [Proposed] Final Approval Order as the proposed order for Plaintiff's pending motions to be heard at the Fairness Hearing. Blanks remain in ¶¶ 12 (amount of Case Contribution Awards), 13 (amount of attorneys' fees), 14 (amount of expenses reimbursed), and 16(d) (number of objections filed). The relief sought herein can be effectuated by filling in the blanks left in ¶¶ 12-16 of that proposed order.

Plaintiffs' (1) Unopposed Motion for Final Approval of Settlement, Certification of Settlement Class and Approval of the Plan of Allocation, and (2) Motion for An Award of Attorneys' Fees, Reimbursement of Expenses and Case Contribution Awards to Named Plaintiffs, and all of the exhibits attached thereto, which declaration was docketed in connection with Plaintiffs' Unopposed Motion for Final Approval of Settlement, Certification of Settlement Class and Approval of the Plan of Allocation.

Dated: September 6, 2016

By: /s/ Samuel E. Bonderoff

Samuel E. Bonderoff

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By: /s/ Michael J. Klein

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